

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	§	Chapter 11
FIELDWOOD ENERGY LLC, <i>et al.</i> ¹	§	§	Case No. 20-33948 (MI)
Debtors.	§	§	(Jointly Administered)
	§		

**ASPEN AMERICAN INSURANCE COMPANY, BERKLEY INSURANCE COMPANY,
EVEREST REINSURANCE COMPANY, AND SIRIUS AMERICA INSURANCE
COMPANY'S (A) OBJECTION TO EMERGENCY MOTION OF DEBTORS FOR AN
ORDER (I) AUTHORIZING ENTRY INTO BACKSTOP COMMITMENT LETTER,
(II) APPROVING OBLIGATIONS THEREUNDER, AND (III) GRANTING RELATED
RELIEF AND (B) JOINDER TO OBJECTION OF ENI US OPERATING CO. INC. AND
ENI PETROLEUM US LLC TO APPROVAL OF EMERGENCY MOTION OF
DEBTORS FOR ORDER (I) AUTHORIZING ENTRY INTO BACKSTOP
COMMITMENT LETTER, (II) APPROVING OBLIGATIONS
THEREUNDER, AND (III) GRANTING RELATED RELIEF**
(Relates to Doc Nos. 1023 and 1110)

Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company, and Sirius America Insurance Company (collectively, the “**Sureties**”), by and through their undersigned counsel, hereby object to the *Emergency Motion of Debtors' for an Order (i) Authorizing Entry into Backstop Commitment Letter, (ii) Approving Obligations Thereunder, and (iii) Granting Related Relief* [Docket No. 1023] (the “**Debtors' Emergency Motion**”) and join in (the “**Joinder**”) the *Objection of ENI US Operating Co. Inc. and ENI Petroleum US LLC to Emergency Motion of Debtors' for an Order (i) Authorizing Entry into Backstop Commitment*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Letter, (ii) Approving Obligations Thereunder, and (iii) Granting Related Relief [Docket No. 1110] (the “**Objection**”) for the reasons set forth therein. In support thereof, the Sureties would respectfully submit as follows:

1. The Sureties hereby join the Objection verbatim as if fully set forth herein.
2. The Sureties hereby reserve the right to raise such other and further objections, and/or to join in any additional objections with respect to the Debtors’ Emergency Motion at any time prior to a final hearing on the Debtors’ Emergency Motion.
3. The Sureties further reserve all rights with respect to these bankruptcy cases, all rights under any bonds, contracts, and indemnity agreements, and all rights with respect to any claims they may assert or have asserted in these cases, including, but not limited to, administrative priority claims that may arise and all other rights in these cases.
4. For the reasons set forth herein and in the Objections, the Sureties hereby request the entry of an order denying the relief requested in the Debtors’ Emergency Motion and granting them such other and further relief, both at law and in equity, to which they may justly be entitled.

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DATED: March 24, 2021.

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Timothy A. Million

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AMERICA INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I certify that on March 24, 2021, a true and correct copy of the foregoing document was served upon all parties receiving electronic notice *via* the Court's ECF/CM filing and notification system.

/s/ *Timothy A. Million*